

BUCKLEY

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October 12, 2022

VIA ECF ONLY

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Buyer, 22 Cr. 397 (RMB)

Dear Judge Berman:

We represent Stephen Buyer in the above matter. On September 27, 2022, the Court adopted the parties' joint proposed motion schedule. *See* ECF No. 22. We now respectfully submit this letter to request a brief extension (four days as to each relevant date below) of the time in which to file our motions, and ask that the Court adopt the revised motion schedule below. The government consents to the extension.

The reason for the request is twofold. First, we have received a voluminous amount of discovery from the government, some of which was unreadable and necessitated production of a new set. The combined productions total, at last count, more than one million documents, which likely translates into more than three million pages. Second, the motions we are preparing are more complex than expected, and include motions to suppress the fruits of 16 warrants. The following revised schedule will give both parties enough time for the pretrial motions:

October 21, 2022 (previously 10/17):	Defendant's pretrial motions due.
November 11, 2022 (previously 11/7):	Government's opposition to defendant's pretrial motions due.
November 18, 2022 (previously 11/14):	Defendant's reply in support of pretrial motions due.
December 7, 2022:	Oral argument (defense requests)

Trial is set for February 21, 2023, and a status conference is currently scheduled for December 7, 2022.

Additionally, for the same reasons, we request leave to exceed the page limits set by this Court. *See* Individual Practices of Hon. Richard M. Berman, § 2.C (memoranda of law in support of and in opposition to motions may be up to 25 pages, and reply memoranda may be up to 10 pages).

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We request up to 50 pages for the defendant's memorandum of law and the government's opposition, and up to 20 pages for the defendant's reply memorandum. The Assistant U.S. Attorneys do not oppose this request.

Thank you for your consideration.

Respectfully submitted,

/s/ Daniel R. Alonso

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cc: All counsel (by ECF)

Application to enlarge time by four
days is granted. It is unclear to the
Court why double the page limit is
necessary. Please advise in writing.

SO ORDERED:

Date: 10/13/22

Richard M. Berman

Richard M. Berman, U.S.D.J.